

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth and HTA.**

ORDER GRANTING FOUR HUNDRED NINETY-THIRD OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO  
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO SATISFIED CLAIMS

Upon the *Four Hundred Ninety-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Satisfied Claims* [ECF No. 21742] (the “Four Hundred Ninety-Third Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA”, and together with the Commonwealth, the “Debtors”), dated August 5, 2022, for entry of an order disallowing in their entirety certain claims filed against the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Ninety-Third Omnibus Objection.

Debtors, as more fully set forth in the Four Hundred Ninety-Third Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Ninety-Third Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Ninety-Third Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Ninety-Third Omnibus Objection (collectively, the “Satisfied Claims”) have been satisfied; and the Court having determined that the relief sought in the Four Hundred Ninety-Third Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Ninety-Third Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Ninety-Third Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are disallowed in their entirety; and it is further

ORDERED that Kroll, is authorized and directed to designate the Satisfied Claims as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21742 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Ninety-Third Omnibus Objection**

Four Hundred Ninety-Third Omnibus Objection  
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	CONDE MERCADO, NANETTE MENENDEZ GASPAR MARTINEZ MANGUAL, ESQ. P.O. BOX 194422 SAN JUAN, PR 00919-4422	05/18/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	19519	\$2,000,000.00*
	Reason: Pursuant to the judgment dated February 25th, 2020 the Puerto Rico Highways and Transportation Authority (HTA) owed the creditor an additional \$36,134.00 plus \$7,495.83 in interest for just compensation of the property subject to this claim. HTA deposited the money to the court on March 3, 2020 and the creditor subsequently withdrew the money on July 21, 2020.					
2	FINCA LA MATILDE, INC. EILEEN M. COFFEY 9166 CALLE MARINA PONCE, PR 00717	05/07/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	12222	\$9,812.34*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2004-0206. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order. All deposited funds have been withdrawn from the account.					
3	FIORINA MARIA VILELLA GARCIA, ET ALS SEE EXHIBIT 1 C/O JOSE F. CARDONA JIMENEZ, ESQ. PO BOX 9023593 SAN JUAN, PR 00902-3593	09/25/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	167504	\$10,108,544.94*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2004-1202. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order. All deposited funds have been withdrawn from the account.					
4	JOSE ALBERTO TORRADO PEREZ AND BLANCA EMERITA DELGADO RODRIGUEZ JOSÉ ALBERTO TORRADO PÉREZ PO BOX 1323 HATILLO, PR 00659-1323	05/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24637	\$24,000.00
	Reason: Invoices totaling \$24,000.00 were paid via checks 00076371, 00093329, 00093330, 00093331, 00093332, 00093333, and 00093334 on 4/3/2018 and 8/28/2018.					

Four Hundred Ninety-Third Omnibus Objection  
Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	ONE BY ONE, INC PO BOX 441 FAJARDO, PR 00738-0441	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	36157	\$19,252.25
	Reason: Invoices totaling \$19,252.25 were paid via checks 93439, 93443, and 93444 on 08/28/2018.					
6	PRODUCTORA ANGELES DEL FIN INC HC 20 BOX 26393 SAN LORENZO, PR 00754	05/09/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10557	\$15,950.00
	Reason: Invoices totaling \$15,950.00 were paid via EFTs 00080284, 00080285, and 00080286 on 05/23/2018.					
7	TECHNICAL POWER SERVICES PO BOX 3826 GUAYNABO, PR 00970	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	21173	\$7,800.00
	Reason: Invoices totaling \$7,800.00 were paid via checks 2380, 2610 and 2634 dated 05/18/2018, 09/05/2018, and 09/14/2018.					
8	VELEZ PINEIRO, MYRNA IRIS PO BOX 2517 ISABELA, PR 00662	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27750	\$15,120.00
	Reason: Invoices totaling \$15,120.00 were paid via checks 63247, 81664, 81663, 98463, 104992, 119645, 140316, 40381, 40380, and 40379 on 08/29/2016, 10/19/2016, 11/29/2016, 12/16/2016, 02/07/2017, 04/26/2017, and 06/22/2017.					
					TOTAL	\$12,200,479.53*